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**From:** Eugene Illovsy [mailto:[eugene@illovskylaw.com](mailto:eugene@illovskylaw.com)]  
**Sent:** Friday, February 02, 2018 6:27 PM  
**To:** Craig Wenner  
**Subject:** Re: Almaty et ano. v. Ablyazov et al

Hi Craig:

Responding to your outstanding requests:

1. Attached is an NDA signature page executed by Mr. Petelin. He had not received any documents in the case that were marked confidential.
2. You mentioned the Kazakh Entities wanting two days (14 hours) for Mr. Petelin's

deposition. We're inclined to think 7 hours is sufficient for a non-party such as Mr. Petelin. (If the Court has issued a discovery order the Kazakh Entities believe is to the contrary, please let me know.)

3. I am happy to have a call, though Mr. Petelin has not yet decided to answer any questions about documents he may or may not have. I believe he was unsettled by the Kazakh Entities' warning that they would be seeking invasive discovery of his personal finances, combined with reports of coordination between Russia and Kazakhstan. I think it makes sense for me to circle back with the client before we have a call.

Regards,

Eugene

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**From:** Craig Wenner <[CWenner@BSFLP.com](mailto:CWenner@BSFLP.com)>

**Date:** Thursday, February 1, 2018 at 7:24 PM

**To:** Eugene Illovsy <[eugene@illovskylaw.com](mailto:eugene@illovskylaw.com)>

**Subject:** RE: Almaty et ano. v. Ablyazov et al

Eugene,

Are you available for a call some time tomorrow? I have now asked multiple times by phone and email whether or not Mr. Petelin is withholding responsive documents. Your letter provided no reason why that question cannot be answered, and I hope Mr. Petelin would want to avoid pointless motion practice if he in fact has nothing.

Regards,

Craig

**Craig Wenner**

Associate

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**From:** Craig Wenner

**Sent:** Friday, January 26, 2018 10:16 AM

**To:** 'Eugene Illovsy'

**Subject:** RE: Almaty et ano. v. Ablyazov et al

Eugene,

Let's schedule for February 26 and 27. As with Ms. Petelina and other witnesses in this case who conduct their depositions in a foreign language, we ask that Mr. Petelin be available for a second day if necessary due to delays associated with translation.

Please also answer my questions below regarding whether Mr. Petelin has responsive documents. I would like to avoid moving to compel the production of something that does not exist. If Mr. Petelin has still refused to produce documents or we are unable to confirm that he has no responsive documents by February 26, we may need to push the deposition back.

Best,  
Craig

**Craig Wenner**  
Associate

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**From:** Eugene Illovsy [mailto:[eugene@illovskylaw.com](mailto:eugene@illovskylaw.com)]  
**Sent:** Thursday, January 25, 2018 5:07 PM  
**To:** Craig Wenner  
**Subject:** Re: Almaty et ano. v. Ablyazov et al

Craig:

Suggested alternative deposition dates: February 26 or 27, or March 8, or 9, or 15, 16.

Eugene

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**From:** Craig Wenner <[CWenner@BSFLP.com](mailto:CWenner@BSFLP.com)>  
**Date:** Wednesday, January 24, 2018 at 1:38 PM  
**To:** Eugene Illovsy <[eugene@illovskylaw.com](mailto:eugene@illovskylaw.com)>  
**Subject:** RE: Almaty et ano. v. Ablyazov et al

Eugene,

Before I respond to Mr. Petelin's specific concerns, there is still the unanswered threshold question of whether Mr. Petelin has any responsive documents at all. Does he? If he does not, a motion to compel would waste everyone's time and money, and waste judicial resources.

Does Mr. Petelin have any documents concerning any of the individuals listed under Request I or the entities under Request II?

As to Request III, Mr. Petelin's initial Responses and Objections state, "Mr. Petelin responds that he has no documents reflecting his sale of oil-and-gas assets." From our conversations, I understand he also has no documents reflecting the sale of any assets relating to Gazprom or any other sales of assets in Russia.

Request III additionally requests documents concerning "the disposition of the proceeds of any such sale or sales." Does Mr. Petelin have any such documents?

Without providing this information, there will be no meaningful way to limit the number of disputes or narrow the issues for the court.

Please also provide suggested alternative dates for Mr. Petelin's deposition.

Thanks,  
Craig

**Craig Wenner**  
Associate

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**From:** Eugene Illovsy [<mailto:eugene@illovskylaw.com>]  
**Sent:** Wednesday, January 24, 2018 2:09 PM  
**To:** Craig Wenner  
**Subject:** Almaty et ano. v. Ablyazov et al

Craig:

Please see attached correspondence.

Thanks,

Eugene

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**Eugene Illovsy**  
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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CITY OF ALMATY, KAZAKHSTAN and BTA  
BANK JSC,

Plaintiffs,

-against-

MUKHTAR ABLYAZOV, VIKTOR  
KHRAPUNOV, ILYAS KHRAPUNOV, and  
TRIADOU SPV S.A.,

Defendants.

15 Civ. 5345 (AJN) (SN)

**NON-DISCLOSURE  
AGREEMENT**

I, Gennady Petelin acknowledge that I have read and understood the Protective Order in this action governing the non-disclosure of Confidential Discovery Material and Confidential Attorneys' Eyes Only Material. I agree that I will not disclose Confidential Discovery Material or Confidential Attorneys' Eyes Only Material to anyone except as permitted by the Protective Order and that at the conclusion of the litigation I will return all Confidential Discovery Material and/or Confidential Attorneys' Eyes Only Material to the Party or attorney from whom I received it. By acknowledging these obligations under the Protective Order, I understand that I am submitting myself to the jurisdiction of the United States District Court for the Southern District of New York for the purpose of any issue or dispute arising hereunder and that my willful violation of any term of the Protective Order could subject me to punishment for contempt of Court.

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Case 1:15-cv-05345-AJN Document 252-1 Filed 11/28/16 Page 13 of 13

Dated: 01/23/2018

Agreed and accepted:

By (sign): 

Name (print): Gennady Peterlin

Position>Title: \_\_\_\_\_